

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California
public benefit corporation; LAURA
CHAMBERS and her marital community;
WINIFRED MITCHELL BAKER and her
marital community, and DANI CHEHAK and
her marital community,

Defendants.

Case No.: 2:24-CV-01032-RAJ

DECLARATION OF AMY
ALEXANDER IN SUPPORT OF
PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION TO
CONTINUE AND TO AMEND CASE
SCHEDULE

I, Amy Alexander, am over the age of 18, have personal knowledge of all the facts stated
herein and declare as follows:

1. I am an attorney at Stokes Lawrence, P.S. and am counsel of record for Plaintiff
Steve Teixeira.

2. Plaintiff initiated this action almost a year ago, on June 12, 2024, by privately
serving but not filing his Complaint on Mozilla Corporation ("Mozilla") under Washington Civil
Rule 3. With the consent of all Defendants, Mozilla filed the Complaint in federal court,

DECLARATION OF AMY ALEXANDER IN SUPPORT OF
PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO
CONTINUE AND TO AMEND CASE SCHEDULE - 1
60606-003

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removing the action to this Court on a month later on July 12, 2024. Plaintiff served all Defendants with discovery requests shortly after, on July 26, 2024.

3. Attached hereto as **Exhibit 1** is a true and correct copy an email thread dated September 3, 2024 involving Defendant Mozilla Foundation (“the Foundation”) requesting an extension to respond to Plaintiff’s first set of discovery requests.

4. Attached here to as **Exhibit 2** is a true and correct copy of an email thread dated August 30, 2024 involving Defendant Mozilla Corporation (“Mozilla”) and Individual Defendants requesting an extension to respond to Plaintiff’s first set of discovery requests.

5. Attached hereto as **Exhibit 3** is a true and correct copy of an email thread dated September 25, 2024 involving Plaintiff’s counsel raising concerns about Mozilla’s and Individual Defendants’ discovery responses and failure to adhere to the parties’ ESI protocol.

6. Attached hereto as **Exhibit 4** is a true and correct copy of an email thread dated October 31, 2024 involving Plaintiff’s counsel raising concerns about the Foundation’s discovery responses and failure to adhere to the parties’ ESI protocol.

7. Attached hereto as **Exhibit 5** is a true and correct copy of email correspondence between Plaintiff, Mozilla, and Individual Defendants regarding search terms and methodologies.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the Foundation’s responses to Plaintiff’s First Set of Discovery requests dated September 10, 2024.

9. Attached hereto as **Exhibit 7** is a true and correct copy of an email thread dated April 3, 2025 involving correspondence between Plaintiff and Mozilla regarding an extension to the trial date and associated deadlines.

1 10 The Parties filed a Joint Status Report and Discovery Plan on August 13, 2024,
2 (Dkt # 13), and estimated the case would be ready for trial between June 24, 2025 to August 25,
3 2025. The Court issued an Order Setting the Trial Date and Related Dates on August 19, 2024
4 (Dkt # 16) setting the trial on October 6, 2025.

5 11. Until April 8, 2025, Mozilla and the Foundation had only produced 205 pages of
6 documents combined in response to requests issued in July 2024. To date, Individual Defendants
7 have not produced any documents at all. The Foundation and Mozilla did not issue additional
8 discovery requests until April 14 and 16, 2025, respectively.

9 12. Mozilla sent Plaintiff a discovery deficiency letter dated February 4, 2025 related
10 to Plaintiff's October 11, 2024 discovery responses.

11 13. Attached hereto as **Exhibit 8** is a true and correct copy of email correspondence
12 between Mozilla and Plaintiff regarding Mozilla's motion to continue deadlines.

13 14. Attached hereto as **Exhibit 9** is email correspondence begun by Plaintiff on April
14 2, 2025, regarding scheduling depositions for both Plaintiff and Defendants.

15 15. Plaintiff completed his production in response to Defendants Mozilla and the
16 Foundation's first sets of discovery requests on April 25, 2025.

17 16. Attached hereto as **Exhibit 10** is a true and correct copy of Defendant Winifred
18 Mitchell Baker's Objections to Plaintiff's Second Set of Interrogatories and Requests for
19 Production dated April 2, 2025.

20 17. Plaintiff made Fed. R. Civ. P. 26(2) disclosures on April 9, 2025. Defendants did
21 not disclose any experts on this date.

22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct.

24 DECLARATION OF AMY ALEXANDER IN SUPPORT OF
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1 DATED this 12th day of May, 2025

2 STOKES LAWRENCE, P.S.

3 By: /s/ Amy Alexander

4 Amy Alexander, WSBA No. 44242

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DECLARATION OF AMY ALEXANDER IN SUPPORT OF
PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO
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